

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CHARLES EDWARD STEED,	:	
on behalf of himself and all	:	
others similarly situated	:	CIVIL ACTION NO.
and	:	1:14-CV-00437-SCJ-ECS
AMY SUMMERS,	:	
on behalf of herself and all others	:	
similarly situated	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
EQUIFAX INFORMATION	:	
SERVICES, LLC	:	
	:	
Defendant.	:	
	:	

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION
OF DISCOVERY AND OTHER PRETRIAL DEADLINES**

Plaintiffs Charles Edward Steed and Amy Summers ("Plaintiffs") move for an extension of the current discovery deadlines, and the scheduling of deadlines for the completion of factual and expert discovery, and the filing of dispositive and class certification motions.¹

The parties have been actively engaged in written discovery and production of documents and have produced documents and written responses to each other,

¹ Counsel for Plaintiffs conferred with counsel for Defendant Equifax Information Services, LLC ("Defendant" or "Equifax") who consents to the filing of this motion.

and have produced several supplemental responses. Plaintiffs Steed and Summers have both provided deposition testimony, and the deposition of one of Defendant's designated witnesses is set for June 16, 2015. Due to the complexity of the case, however, Defendant will need to designate at least two other witnesses to testify in response to Plaintiff's Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6). Additionally, following the testimony by Defendant's corporate representatives, the parties will need to complete depositions of fact witnesses identified during the course of written discovery. Finally, some written discovery remains outstanding.

The parties believe that these depositions and the remaining written discovery cannot be completed under the existing schedule, are necessary, and will streamline the issues going forward and focus the subsequent motion practice appropriately.

The parties therefore respectfully request that the remaining case deadlines be extended by sixty (60) days with the new deadlines as follows:

EVENT	DATE
Completion of Factual Discovery	August 17, 2015
Completion of Expert Discovery	October 16, 2015
Filing of Dispositive Motions	November 16, 2015

Filing of Responses to Dispositive Motions	December 18, 2015
Filing of Replies to Dispositive Motions	January 18, 2016
Filing of Motion for Class Certification	November 16, 2015, to thirty days after ruling on dispositive motions

Dated: June 10, 2015

Respectfully Submitted,

s/ James M. Feagle

James M. Feagle
Ga Bar No. 256916
Skaar & Feagle, LLP
2374 Main Street, Suite B
Tucker, GA 30084
(404) 373 – 1970 (Telephone)
(404) 601 – 1855 (Facsimile)

Robert S. Sola (*pro hac vice*)
Robert S. Sola, P.C.
8835 SW Canyon Lane, Suite 130
Portland, OR 97225
(503) 295 – 6880 (Telephone)
(503) 291 – 9172 (Facsimile)

Kris Skaar
Justin T. Holcombe
Skaar & Feagle, LLP
133 Mirramont Lake Drive
Woodstock, GA 30189
(770) 427 – 5600 (Telephone)
(404) 601 – 1855 (Facsimile)

James A. Francis (*pro hac vice*)
John Soumilas (*pro hac vice*)
David A. Searles (*pro hac vice*)
Francis & Mailman, P.C.
Land Title Building, 19th Floor
100 South Broad Street
Philadelphia, PA 19110
(215) 735 – 8600 (Telephone)
(215) 940 – 8000 (Facsimile)

Micah S. Adkins (*pro hac vice*)
Burke Harvey LLC
2151 Highland Avenue, Suite 120
Birmingham, AL 35205
(205) 747 – 1907 (Telephone)
(205) 930 – 9054 (Facsimile)

Attorneys for Plaintiffs Charles Edward Steed and Amy Summers

/s/ Meryl W. Roper (w/ permission)

Meryl W. Roper

Georgia Bar No. 238919

Zachary A. McEntyre

Georgia Bar No. 653571

King & Spalding LLP

1180 Peachtree Street, N.E.

Atlanta, GA 30309

Attorneys for Defendant Equifax Information Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically filed with the clerk of the court using the CM/ECF system which will send notice of such filing to the following counsel:

Meryl W. Roper
Zachary A. McEntyre
King & Spalding, LLP
1180 Peachtree Street, N.E.
Atlanta, GA 30309-3521
(404) 572 – 4600 (Telephone)
(404) 572 – 5100 (Facsimile)
Attorneys for Defendant Equifax Information Services, LLC

Dated this 10th day of June 2015.

s/ James M. Feagle
James M. Feagle
Skaar & Feagle, LLP
2374 Main Street, Suite B
Tucker, GA 30084